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Attorneys for Plaintiff
United States of America

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

RAYLON THIJAY RANDLE,

Defendant.

CASE NO. 1:21-CR-00246-DAD-BAM

STIPULATION REGARDING EXCLUDABLE
TIME PERIODS UNDER SPEEDY TRIAL ACT;
ORDER

DATE: April 26, 2023

TIME: 1:00 p.m.

COURT: Hon. Magistrate Judge Barbara A. McAuliffe

STIPULATION

Plaintiff United States of America, by and through its counsel of record, and defendant, by and through defendant's counsel of record, hereby stipulate as follows:

1. By previous order, this matter was scheduled for a status conference on April 26, 2023.
2. By this stipulation, the parties move to continue the status conference until June 14, 2023, and to exclude time from calculation under the Speedy Trial Act between April 26, 2023, and June 14, 2023.
3. The parties agree and stipulate, and request that the Court find the following:
 - a) Initial discovery was provided to defendant on or about October 18, 2021, consisting of 114 Bates-stamped items including reports of investigation, body worn camera recordings, photographs, certified conviction records and a summary of defendant's criminal history.

1 b) The government transmitted a plea offer to counsel for defendant on February 15,
2 2022.

3 c) Counsel for defendant desires additional time to review discovery and consult
4 with her client. Additionally, defense needs additional time for defense investigation relating to
5 possible pretrial motions.

6 d) The parties agree to discuss a trial date and be prepared to either set a motion
7 schedule or set a trial date by the next status conference on June 14, 2023.

8 e) Counsel for defendant believes that failure to grant the above-requested
9 continuance would deny her the reasonable time necessary for effective preparation, taking into
10 account the exercise of due diligence.

11 f) Based on the above-stated findings, the ends of justice served by continuing the
12 case as requested outweigh the interest of the public and the defendant in a trial within the
13 original date prescribed by the Speedy Trial Act.

14 g) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,
15 et seq., within which trial must commence, the time period of April 26, 2023 to June 14, 2023,
16 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv), because it results
17 from a continuance granted by the Court request on the basis of the Court's finding that the ends
18 of justice served by taking such action outweigh the best interest of the public and the defendant
19 in a speedy trial.

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4. Nothing in this stipulation and order shall preclude a finding that other provisions of the Speedy Trial Act provide that additional time periods are excludable from the period within which a trial must commence.

IT IS SO STIPULATED.

Dated: April 20, 2023

PHILLIP A. TALBERT
United States Attorney

/s/ KIMBERLY A. SANCHEZ
KIMBERLY A. SANCHEZ
Assistant United States Attorney

Dated: April 20, 2023

/s/ CHRISTINA M. CORCORAN
CHRISTINA M. CORCORAN
Counsel for Defendant
RAYLON THIJAY RANDLE

ORDER

IT IS SO ORDERED that the status conference is continued from April 26, 2023, to **June 14, 2023, at 1:00 p.m. before Magistrate Judge Barbara A. McAuliffe**. Time is excluded pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv). The parties shall be prepared to either set a motion schedule or set a trial date at the next status conference.

IT IS SO ORDERED.

Dated: April 20, 2023

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE